

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED: _____
BEHBOUD NAJAFI	:	VIOLATIONS: 18 U.S.C. § 1001(a)(2) (False statements - 1 Count) 8 U.S.C. § 1305(a) and § 1306(b) (Failure to Report Address Change - 1 Count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, defendant BEHBOUD NAJAFI was an Iranian national with permanent resident status in the United States.

2. On or about December 10, 2002, in the Eastern District of Pennsylvania and elsewhere, the defendant,

BEHBOUD NAJAFI,

in a matter within the jurisdiction of the United States Immigrations and Naturalization Service, an agency of the executive branch of the government of the United States, knowingly and willfully made and caused to be made a materially false, fictitious, and fraudulent statement and representation, claiming on an INS Form I-131 application for permission to travel to Canada and Turkey that his address was 9440 Landsford Street, Philadelphia, Pennsylvania, when in fact, as the defendant well knew, it was not his address.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

In or about December 2002, in the Eastern District of Pennsylvania and elsewhere,
the defendant,

BEHBOUD NAJAFI,

knowingly and willfully failed to notify in writing the Attorney General of the United States of
his change of address to 1407 Dickinson Street, Philadelphia, Pennsylvania.

In violation of Title 8, United States Code, Section 1305(a) and 1306(b).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
UNITED STATES ATTORNEY